

125
January 10, 1990

Mr. William E. Dame
Olin Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

Re: Hazardous Waste Compliance Inspection
EPA Identification Number KSD000203638

Dear Mr. Dame:

On December 20, 1989, representatives of the department conducted an inspection of your facility to determine compliance with state and federal regulations concerning hazardous waste.

The inspection revealed that Olin Water Services-Olin Corporation generates hazardous waste from the preparation of liquid and powder water treatment formulations. These wastes are identified by the following waste codes:

D001 Solid waste which exhibits the characteristics of Ignitability
D002 Solid waste which exhibits the characteristics of Corrosivity
D003 Solid waste which exhibits the characteristics of Reactivity
D007 Solid waste which exhibits the characteristics of EP Toxicity for chromium
F001 Methylene Chloride which exhibits the characteristics of being toxic
Various U-Listed chemicals

In addition to being a generator, Olin Water Services has a hazardous waste storage permit. The facility is, therefore, subject to the requirements of 40 CFR, Parts 260 to 264, 270, and 124 and the specific conditions of Permit Number KSD000203638.

The inspection identified the following items not in compliance with state and federal regulations concerning generators of hazardous waste:

Inspection Schedule

1. Documented monthly inspections of the waste area sprinkler system are not being conducted in accordance with attachments II, item II D of the permit and 40 CFR 264.15.



R00011223
RCRA Records Center

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The inspection revealed that since November of 1988, bi-monthly inspections have been conducted rather than the required monthly inspections.

Personnel Training

2. The following personnel have not received documented annual updated hazardous waste management training as required by attachment III, Section 4 of the permit, and 40 CFR 264.16.

Plant Personnel	Last Trained
William Dame, Plant Manager	4-12-88
Bill Whiles, Plant Supervisor	3-22-88
J. Wyant	3-22-88
A. Hernandez	3-22-88
D. Franklin	3-22-88

The above deficiencies must be corrected by February 15, 1990. Notify our department in writing when corrected and identify the corrective action taken for each deficiency noted.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning this letter, please call me at the Northeast District Office in Lawrence at 913/842-4600.

Respectfully,

Jim Fischer
Environmental Technician
Inspections and Enforcement Section
Bureau of Air and Waste Management

JF:gz

C: Tom Gross, Bureau of Air and Waste Management
John Paul Goetz, Bureau of Air and Waste Management
NEDO

Summary
Olin Water Services
Kansas City, Kansas

The basic operation, waste generation, and waste management practices have not significantly changed since previous compliance inspections.

Violations

1. According to information provided by Mr. Dame, someone at the corporate office decided that monthly inspections were too costly, and not being aware of permit requirements, modified the contract with ADT to bi-monthly inspections. Mr. Dame indicated that this policy would change beginning January 1990, and monthly inspections would resume.
2. Company safety training has been conducted along with segments of hazardous waste training, however, there has not been an annual update of hazardous waste training. I recommended that hazardous waste training be conducted in one session rather than breaking it into separate training blocks given over a period of time.

General Information

During the month of December 1989, Olin Water Service was purchased by Drew Inc. (Ashland Chemical Company). An environmental audit of Olin was conducted by Drew representatives. Monitoring wells were placed near the above ground product storage tanks located on the east side of 3155 Fiberglass. The south tank contains Morpholine and Cyclohexylamine. The north tank contains Sodium Hydroxide. A well was also placed near the permitted hazardous waste storage area and another well was placed to the south of the property near a building formerly occupied by Grief Brothers Containers. Mr. Dame did not know if samples have been collected from the wells.

On the date of the inspection, the permitted storage area held 79 drums of ignitable wastes, 39 drums of EP Toxic Wastes, and 3 drums of corrosive wastes. The storage area also held a quantity of non-hazardous waste.

February 5, 1990

Mr. William Dame
OLIN Water Services
3155 Fiberglass Road
Kansas City, Kansas 66115

Re: Hazardous Waste Compliance Inspection of December 20, 1989
EPA Identification Number KSD000203638

Dear Mr. Dame:

Thank you for your letter dated January 22, 1990, indicating action has been taken to correct violations noted during the inspection.

Your cooperation with the hazardous waste management program is appreciated. If you have questions concerning this letter, please call me at 913/842-4600.

Respectfully,

Jim Fischer
Environmental Technician
Inspections and Enforcement Section
Bureau of Air and Waste Management

JF:gz

C: Tom Gross, Bureau of Air and Waste Management
John Paul Goetz, Bureau of Air and Waste Management
NEDO

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

1. EPA ID: <u>KSD 000203638</u> 2. FACILITY NAME: <u>OLIN WATER SERVICES</u> 3. CITY: <u>Kansas City</u> COUNTY: <u>Wyandotte</u> 4. No EPA ID: <input type="checkbox"/>						5. FACILITY TYPE: <input checked="" type="checkbox"/> TSD <input type="checkbox"/> GEN <input type="checkbox"/> KG <input type="checkbox"/> SQ <input type="checkbox"/> TRANSPORTER <input type="checkbox"/> NOT A GENERATOR GOVERNMENT FACILITY: <input type="checkbox"/> PUT F, S, C IN BOX F - FEDERAL S - STATE L - LOCAL						EPA COMPLE THIS BLOCK <input type="checkbox"/> GWM <input type="checkbox"/>					
6. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: <u>12/20/89</u>						INSPECTOR: <u>JDF</u>											
7. TYPE OF EVALUATION COVERED BY THIS REPORT: PUT CODE IN BOX <input checked="" type="checkbox"/> CHOOSE ONE						1 = COMPLIANCE EVALUATION INSPECTION (CEI) 2 = SAMPLING INSPECTION 3 = RECORD REVIEW						4 = COMPLIANCE GWM EVALUATION (CME) 5 = COMPLIANCE SCHEDULE EVALUATION (CSI) 11 = CASE DEVELOPMENT INSPECTION 12 = OPERATION AND MAINTENANCE EVALUATION					
8. DATE OF EVALUATION COVERED BY THIS REPORT (ENTER ONLY IF DIFFERENT FROM 6.): <u>2-5-90 (UPDATE)</u>														<u>FT 2-9-90</u>		<u>2-14-90</u>	
9. AREA AND CLASS OF VIOLATION (ENTER NUMBER OF VIOLATIONS BY AREA AND CLASS):														<u>CL N/A</u>		<u>Hwoms 2-9-90</u>	
CLASS OF VIOLATION	AREA OF VIOLATION															OT	
	NOT.	PRE-TRANS.	ACCUM. 90 D.	GEN FAC. STANDARDS	PREP & PREVENT	CONT. & E.P.	STOR. COND.	GWM/RLS	CE/PCL	FIN REQ	PART B	COMP SCH.	MAN RPT	LAND BAN			
I																	
II															0		
10. ENFORCEMENT ACTIONS FOR VIOLATIONS: <u>2-5-90</u>																	
AREA OF VIOLATION	TYPE OF ACTION TAKEN (CIRCLE ONE)				DATE ACTION TAKEN (MDY)	COMPLIANCE DATES (MDY)		PENALTY									
						SCHEDULED	ACTUAL	ASSESSED	COLLECTED								
<u>0</u>					<u>1/10/90</u>	<u>2/15/90</u>	<u>1/22/90</u>										
	INFORMAL WL/NOV AO CivAc CRIMAc				<u>1/1/</u>	<u>1/1/</u>	<u>1/1/</u>										
	INFORMAL WL/NOV AO CivAc CRIMAc				<u>1/1/</u>	<u>1/1/</u>	<u>1/1/</u>										
	INFORMAL WL/NOV AO CivAc CRIMAc				<u>1/1/</u>	<u>1/1/</u>	<u>1/1/</u>										
	INFORMAL WL/NOV AO CivAc CRIMAc				<u>1/1/</u>	<u>1/1/</u>	<u>1/1/</u>										
COMMENTS: EIGHTY CHARACTER LIMIT. <u>VIOLATIONS CORRECTED</u>																	